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Attorneys for Defendant
DISCOVER FINANCIAL SERVICES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

WALTER BRADLEY, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

DISCOVER FINANCIAL SERVICES,

Defendant.

Case No. 3:11-cv-05746-NC

[Assigned to the Hon. Nathanael Cousins]

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO CLASS ACTION
COMPLAINT**

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME TO RESPOND

CASE NO. 3:11-cv-05746-NC

STIPULATION

WHEREAS, on November 30, 2011, plaintiff Walter Bradley (“Plaintiff”) filed a Complaint in this Court;

WHEREAS, on December 19, 2011, defendant Discover Financial Services (“Defendant”) executed a Waiver of the Service of Summons, which was filed with this Court on December 22, 2011;

WHEREAS, Defendant’s response to the Complaint currently is due on or before February 7, 2012;

WHEREAS, the parties have agreed to a brief extension of the time for Defendant to answer or otherwise respond to the Complaint;

WHEREAS, pursuant to Local Rule 6-1(a), parties may agree to an extension of time within which to answer or otherwise respond to a complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, the extension proposed herein will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, no previous extensions have been requested; and

WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall respond to the Complaint no later than February 21, 2012.

IT IS SO STIPULATED.

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
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Dated: January 23, 2012

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
LISA M. SIMONETTI
JASON S. YOO

By: /s/ Lisa M. Simonetti
Lisa M. Simonetti

Attorneys for Defendant
DISCOVER FINANCIAL SERVICES

Dated: January 23, 2012

ANKCORN LAW FIRM, PC
MARK ANKCORN

By: /s/ Mark Ankorn
Mark Ankorn

Attorneys for Plaintiff
WALTER BRADLEY

~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: January 23, 2012


HON. NATHANAEL COUSINS

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2012, a copy of the foregoing
**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO
CLASS ACTION COMPLAINT** was filed electronically. Notice of this filing will be
sent by e-mail to all parties by operation of the court's electronic filing system or by
mail to anyone unable to accept electronic filing as indicated on the Notice of
electronic Filing. Parties may access this filing through the court's EM/ECF System.

/s/ Lisa M. Simonetti
Lisa M. Simonetti

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